

U.S. Department of Justice

United States Attorney Eastern District of New York

EMN:SPN F.#2014R00190 271 Cadman Plaza East Brooklyn, New York 11201

September 23, 2015

By ECF

The Honorable Raymond J. Dearie United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. José Hawilla, et al.

Criminal Docket No. 14-609 (RJD)

Dear Judge Dearie:

The government respectfully requests that the sentencing control date for defendants José Hawilla, Traffic Sports USA, Inc., and Traffic Sports International, Inc., currently set for September 25, 2015 at 10:00 a.m., be adjourned to April 8, 2016 at 10 a.m., a date and time the parties have been informed is convenient for the Court. Defense counsel have been consulted and join in this request. Defense counsel have indicated that the corporate defendants require additional time to resolve outstanding financial issues in advance of sentencing. An adjournment of the sentencing control date for Mr. Hawilla for at least six months also is appropriate under the circumstances.

Finally, the adjournment will allow the Probation Department time to conduct its presentence investigation with respect to the corporate defendants.

Respectfully submitted,

KELLY T. CURRIE Acting United States Attorney Eastern District of New York

By: <u>/s/</u>

Evan M. Norris Amanda Hector Darren A. LaVerne Samuel P. Nitze M. Kristin Mace Keith Edelman Assistant U.S. Attorneys 718-254-7000

Michael Bachner, Esq.

Nicholas G. Arons, Esq.

cc: